

**Objection Deadline: October 12, 2006 at 4:00 p.m.**  
**Hearing Date & Time: October 19, 2006 at 10:00 a.m.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**NOTICE OF AMENDED SECOND INTERIM APPLICATION OF QUINN EMANUEL  
URQUHART OLIVER & HEDGES LLP, SPECIAL LITIGATION COUNSEL TO THE  
DEBTORS-IN-POSSESSION, FOR COMPENSATION AND REIMBURSEMENT OF  
EXPENSES**

PLEASE TAKE NOTICE that on July 31, 2006, Quinn Emanuel Urquhart Oliver & Hedges, LLP, special litigation counsel to Delphi Corporation retained in the ordinary course of business, filed its Amended Second Interim Application of Quinn Emanuel Urquhart Oliver & Hedges, LLP as Special Litigation Counsel to Debtors for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2006 through May 31, 2006, together with the following exhibits:

- A. Application for Order Under 11 U.S.C. §§327(c) and 1107(b), and FED.R.Bank.P.2014 Authorizing Employment and Retention of Quinn Emanuel Urquhart Oliver & Hedges, LLP as Special Litigation Counsel to Debtors; Affidavit of Gerald E. Hawxhurst In Support of Application For Order 11 U.S.C. §§327(c) and 1107(b), and FED.R.Bank.P.2014 Authorizing Employment and Retention of Quinn Emanuel Urquhart Oliver & Hedges, LLP as Special Litigation Counsel to Debtors; and Order Under 11 U.S.C. §§327(c) and 1107(b), and FED.R.Bank.P.2014 Authorizing Employment and Retention of Quinn Emanuel Urquhart Oliver & Hedges, LLP as Special Litigation Counsel to Debtors.
- B. Contemporaneous Time Records of Services Performed by Quinn Emanuel Urquhart Oliver & Hedges, LLP for Debtors.

- C. Summary of Professional Hours.
- D. Summary of Monthly Fee Statements.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Application will be held on **October 19, 2006, at 10:00 a.m. (Prevailing Eastern Time)** (the "Hearing") before Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York, 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Application (a) must be in writing, (b) must conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Order Under 11 U.S.C. §§102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing (I) Omnibus Hearing Dates, (II) Certain Notice, Case Management, And Administrative Procedures, And (III) Scheduling An Initial Case Conference In Accordance With Local Bankr. R. 1007-2(e) (the "Case Management Order") (Docket No. 245), (c) must be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) - registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), Word Perfect, or any other Windows-based word processing format), (d) must be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) must be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel), (ii) Quinn Emanuel Urquhart Oliver & Hedges, LLP, 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017 (Att'n: Jerry Hawxhurst); (iii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr.); (iv) counsel to

Prepetition Credit Facility Agent, Simpson Thatcher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Att'n: Marissa Wesley); (v) counsel to Postpetition Credit Facility Agent, Davis Polk & Wardell, 450 Lexington Avenue, New York, New York 10017 (Att'n: Marlane Melican); (vi) counsel to Unsecured Creditors Committee, Latham & Watkins, 885 Third Avenue, New York, New York 10022 (Att'n: Robert Rosenberg); and (vii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Alicia M. Leonhard), in each case so as to be **received** no later than **4:00 p.m. (Prevailing Eastern Time) on October 12, 2006** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only those objections made in writing, in accordance with the Case Management Order, and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Application without further notice.

DATED: Los Angeles, California  
July 31, 2006

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

By: 

Gerald E. Hawxhurst

856 South Figueroa Street, 10th Floor  
Los Angeles, California 90017